

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ALLSTATE INSURANCE COMPANY, ALLSTATE
INDEMNITY COMPANY, ALLSTATE PROPERTY &
CASUALTY COMPANY AND ALLSTATE FIRE &
CASUALTY INSURANCE COMPANY,

Index No.: 14-6756 (JBW-MDG)

ANSWER

Plaintiff,

vs.

A & F MEDICAL P.C., ADVANCED CHIROPRACTIC
OF NEW YORK P.C., ALIGNMENT CHIROPRACTIC
CARE P.C., ART OF HEALING MEDICINE, P.C.,
ATLAS ORTHOGONAL CHIROPRACTIC P.C.,
AVICENNA MEDICAL ARTS P.L.L.C., AVM
CHIROPRACTIC P.C., BIG APPLE CHIROPRACTIC
P.C., BRONX-METRO CHIROPRACTIC HEALTH
SERVICES P.C., BSZ CHIROPRACTIC P.C.,
DEDICATED CHIROPRACTIC P.C., DUMONT
MEDIACLA DIAGNOSTICS P.C., DYNASTY
MEDICAL CARE, P.C., ELMONT WELLNESS
'CHIROPRACTIC, P.C., FLOW CHIROPRACTIC P.C.,
GOLDEN HANDS CHIROPRACTIC, P.C., GREAT
HEALTH CARE CHIROPRACTIC P.C., HEIGHTS
CHIROPRACTIC SERVICES P.C., M. SADEES M.D.
P.C., NEW BEGINNING CHIROPRACTIC P.C., NO
MORE PAIN CHIROPRACTIC P.C., NORTSHORE
CHIROPRACTIC DIAGNOSTICS P.C., POWER
CHIROPRACTIC P.C., PRIORITY MEDICAL
DIAGNOSTICS P.C., RB CHIROPRACTIC CARE P.C.,
RICHMOND MEDICAL DIAGNOSTICS P.C.,
SUPREME HEALTH CHIROPRACTIC P.C., TRUE-
ALIGN CHIROPRACTIC CARE P.C., WAY TO
HEALTH CHIROPRACTIC P.C., WHITE PLAINS
MEDICAL CARE P.C., ROBERT ALBANO, D.C.,
ADELIYA ISAAKOVNA AKPAN, M.D., KARL
BAUER, D.C., AUTUMN CUTLER, D.C., AHMED

ELSOURY, M.D., NICHOLAS FENNELLI, M.D.,
ANDREW GARCIA, D.C., MICHAEL GORELIK, D.C.,
SURENDER GORUKANTI, M.D., GRAIG
GRANOVSKY, D.C., JOSEPH HUMBLE, D.C.,
ANTHONY MADRACCHIA, D.C., ALEXANDER
MAZUROVSKY, D.C., SOPHIA MOHUCHY, D.C.,
RUSSELL NERSESOV, D.C., CHARLES HGUYEN,
D.C., MOHAMED NOUR, M.D., RAMKUMAR
PANHANI, M.D., SVETLANA PINKUSOVICH, M.D.,
ALEXANDER PINKUSOVICH, M.D., NICOLETTE
MERAV SADEES, M.D., PAUL SCARBOROUGH, D.C.,
MARK SOFFER, D.C., ALEXANDER VEDER, M.D.
NARCISE VERSAILLES, M.D., GUY VILLANO, D.C.,
MELANIE WALCOTT, D.C. AND YAKOV
ZILBERMAN, D.C.,

Defendants.

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Defendants **M. SADEES M.D. P.C.**, a dissolved corporation, and **NICOLETTE
MERAV SADEES** (hereafter "Defendants") by and through their attorneys, Tumelty &
Spier, LLP, as and for their **ANSWER** to the Complaint of the Plaintiffs, states the
following:

AS TO THE PRELIMINARY STATEMENT

1. Defendants deny information to form a belief as to the allegations made as
they concern co-defendants named herein, and deny the allegations as they relate to
answering defendants as set forth in paragraphs 1 through 45 of the complaint, and refer all
questions of law to this Honorable Court.

AS TO THE NATURE OF THE ACTION.

2. As to the complaint paragraph 46 no response is required.

AS TO THE NATURE OF THE RELIEF SOUGHT.

3. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 47 through 51 of the complaint, and refer all questions of law to this Honorable Court.

AS TO THE PARTIES

A. Plaintiffs

4. Defendants deny information to form a belief as to the allegations made as set forth in paragraphs 52 through 55 of the complaint, and refer all questions of law to this Honorable Court.

B. Defendant Licensed Healthcare Professionals.

5. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 56 through 95, and 98 through 111 of the complaint, and deny the allegations of the complaint against answering defendants contained in paragraphs 96, and 97, and refer all questions of law to this Honorable Court.

C. Defendant PC's

6. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 112 through 147, and 150 through 171 of the complaint, and deny the allegations of the complaint against answering defendants contained in paragraphs 148, and 149, and refer all questions of law to this Honorable Court.

Jurisdiction and Venue

7. Defendants deny information to form a belief as to the allegations made in paragraphs 172 through 174 of the complaint and refer all questions of law to this Honorable Court.

Factual Background

8. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 175 through 270 of the complaint, and refer all questions of law to this Honorable Court.

First Claim for Relief

9. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 271 through 284 of the complaint, and refer all questions of law to this Honorable Court.

Second Claim for Relief

10. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 285 through 297 of the complaint, and refer all questions of law to this Honorable Court.

Third Claim for Relief

11. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 298 through 301 of the complaint, and refer all questions of law to this Honorable Court.

Fourth Claim for Relief

12. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 302 through 314 of the complaint, and refer all questions of law to this Honorable Court.

Fifth Claim for Relief

13. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 315 through 327 of the complaint, and refer all questions of law to this Honorable Court.

Sixth Claim for Relief

14. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 328 through 331 of the complaint, and refer all questions of law to this Honorable Court.

Seventh Claim for Relief

15. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 332 through 344 of the complaint, and refer all questions of law to this Honorable Court.

Eighth Claim for Relief

16. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 345 through 357 of the complaint, and refer all questions of law to this Honorable Court.

Ninth Claim for Relief

17. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 358 through 361 of the complaint, and refer all questions of law to this Honorable Court.

Tenth Claim for Relief

18. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 362 through 374 of the complaint, and refer all questions of law to this Honorable Court.

Eleventh Claim for Relief

19. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 375 through 387 of the complaint, and refer all questions of law to this Honorable Court.

Twelfth Claim for Relief

20. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 388 through 391 of the complaint, and refer all questions of law to this Honorable Court.

Thirteenth Claim for Relief

21. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 392 through 404 of the complaint, and refer all questions of law to this Honorable Court.

Fourteenth Claim for Relief

22. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 405 through 417 of the complaint, and refer all questions of law to this Honorable Court.

Fifteenth Claim for Relief

23. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 418 through 421 of the complaint, and refer all questions of law to this Honorable Court.

Sixteenth Claim for Relief

24. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 422 through 434 of the complaint, and refer all questions of law to this Honorable Court.

Seventeenth Claim for Relief

25. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 435 through 447 of the complaint, and refer all questions of law to this Honorable Court.

Eighteenth Claim for Relief

26. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 448 through 451 of the complaint, and refer all questions of law to this Honorable Court.

Nineteenth Claim for Relief

27. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 452 through 464 of the complaint, and refer all questions of law to this Honorable Court.

Twentieth Claim for Relief

28. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 465 through 477 of the complaint, and refer all questions of law to this Honorable Court.

Twenty- First Claim for Relief

29. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 478 through 481 of the complaint, and refer all questions of law to this Honorable Court.

Twenty- Second Claim for Relief

30. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 482 through 494 of the complaint, and refer all questions of law to this Honorable Court.

Twenty-Third Claim for Relief

31. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 495 through 507 of the complaint, and refer all questions of law to this Honorable Court.

Twenty-Fourth Claim for Relief

32. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 508 through 511 of the complaint, and refer all questions of law to this Honorable Court.

Twenty Fifth Claim for Relief

33. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 512 through 524 of the complaint, and refer all questions of law to this Honorable Court.

Twenty Sixth Claim for Relief

34. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 525 through 537 of the complaint, and refer all questions of law to this Honorable Court.

Twenty- Seventh Claim for Relief

35. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 538 through 541 of the complaint, and refer all questions of law to this Honorable Court.

Twenty Eighth Claim for Relief

36. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 542 through 554 of the complaint, and refer all questions of law to this Honorable Court.

Twenty Ninth Claim for Relief

37. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 555 through 567 of the complaint, and refer all questions of law to this Honorable Court.

Thirtieth Claim for Relief

38. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 568 through 571 of the complaint, and refer all questions of law to this Honorable Court.

Thirty First Claim for Relief

39. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 572 through 584 of the complaint, and refer all questions of law to this Honorable Court.

Thirty Second Claim for Relief

40. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 585 through 597 of the complaint, and refer all questions of law to this Honorable Court.

Thirty Third Claim for Relief

41. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 598 through 601 of the complaint, and refer all questions of law to this Honorable Court.

Thirty Fourth Claim for Relief

42. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 602 through 614 of the complaint, and refer all questions of law to this Honorable Court.

Thirty Fifth Claim for Relief

43. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 615 through 627 of the complaint, and refer all questions of law to this Honorable Court.

Thirty Sixth Claim for Relief

44. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 628 through 631 of the complaint, and refer all questions of law to this Honorable Court.

Thirty Seventh Claim for Relief

45. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 632 through 644 of the complaint, and refer all questions of law to this Honorable Court.

Thirty Eighth Claim for Relief

46. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 645 through 657 of the complaint, and refer all questions of law to this Honorable Court.

Thirty Ninth Claim for Relief

47. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 658 through 661 of the complaint, and refer all questions of law to this Honorable Court.

Fortieth Claim for Relief

48. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 662 through 674 of the complaint, and refer all questions of law to this Honorable Court.

Forty First Claim for Relief

49. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 675 through 687 of the complaint, and refer all questions of law to this Honorable Court.

Forty Second First Claim for Relief

50. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 688 through 691 of the complaint, and refer all questions of law to this Honorable Court.

Forty Third Claim for Relief

51. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 692 through 704 of the complaint, and refer all questions of law to this Honorable Court.

Forty Fourth Claim for Relief

52. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 705 through 717 of the complaint, and refer all questions of law to this Honorable Court.

Forty Fifth Claim for Relief

53. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 718 through 721 of the complaint, and refer all questions of law to this Honorable Court.

Forty Sixth Claim for Relief

54. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 722 through 734 of the complaint, and refer all questions of law to this Honorable Court.

Forty Seventh Claim for Relief

55. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 735 through 746 of the complaint, and refer all questions of law to this Honorable Court.

Forty Eighth Claim for Relief

56. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 747 through 750 of the complaint, and refer all questions of law to this Honorable Court.

Forty Ninth Claim for Relief

57. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 751 through 763 of the complaint, and refer all questions of law to this Honorable Court.

Fiftieth Claim for Relief

58. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 764 through 776 of the complaint, and refer all questions of law to this Honorable Court.

Fifty First Claim for Relief

59. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 777 through 780 of the complaint, and refer all questions of law to this Honorable Court.

Fifty Second Claim for Relief

60. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 781 through 793 of the complaint, and refer all questions of law to this Honorable Court.

Fifty Third Claim for Relief

61. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 794 through 806 of the complaint, and refer all questions of law to this Honorable Court.

Fifty Fourth Claim for Relief

62. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 807 through 810 of the complaint, and refer all questions of law to this Honorable Court.

Fifty Fifth Claim for Relief

63. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 811 through 823 of the complaint, and refer all questions of law to this Honorable Court.

Fifty Sixth Claim for Relief

64. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 824 through 836 of the complaint, and refer all questions of law to this Honorable Court.

Fifty Seventh Claim for Relief

65. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 837 through 840 of the complaint, and refer all questions of law to this Honorable Court.

Fifty Eighth Claim for Relief

66. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 841 through 853 of the complaint, and refer all questions of law to this Honorable Court.

Fifty Ninth Claim for Relief

67. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 854 through 866 of the complaint, and refer all questions of law to this Honorable Court.

Sixtieth Claim for Relief

68. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 867 through 870 of the complaint, and refer all questions of law to this Honorable Court.

Sixty First Claim for Relief

69. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 871 through 883 of the complaint, and refer all questions of law to this Honorable Court.

Sixty Second Claim for Relief

70. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 884 through 896 of the complaint, and refer all questions of law to this Honorable Court.

Sixty Third Claim for Relief

71. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 897 through 900 of the complaint, and refer all questions of law to this Honorable Court.

Sixty Fourth Claim for Relief

72. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 901 through 913 of the complaint, and refer all questions of law to this Honorable Court.

Sixty Fifth Claim for Relief

73. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 914 through 926 of the complaint, and refer all questions of law to this Honorable Court.

Sixty Sixth Claim for Relief

74. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 927 through 930 of the complaint, and refer all questions of law to this Honorable Court.

Sixty Seventh Claim for Relief

75. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 931 through 943 of the complaint, and refer all questions of law to this Honorable Court.

Sixty Eighth Claim for Relief

76. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 944 through 956 of the complaint, and refer all questions of law to this Honorable Court.

Sixty Ninth Claim for Relief

77. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 957 through 960 of the complaint, and refer all questions of law to this Honorable Court.

Seventieth Claim for Relief

78. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 961 through 973 of the complaint, and refer all questions of law to this Honorable Court.

Seventy First Claim for Relief

79. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 974 through 986 of the complaint, and refer all questions of law to this Honorable Court.

Seventy Second Claim for Relief

80. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 987 through 990 of the complaint, and refer all questions of law to this Honorable Court.

Seventy Third Claim for Relief

81. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 991 through 1003 of the complaint, and refer all questions of law to this Honorable Court.

Seventy Fourth Claim for Relief

82. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1004 through 1016 of the complaint, and refer all questions of law to this Honorable Court.

Seventy Fifth Claim for Relief

83. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1017 through 1020 of the complaint, and refer all questions of law to this Honorable Court.

Seventy Sixth Claim for Relief

84. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1021 through 1033 of the complaint, and refer all questions of law to this Honorable Court.

Seventy Seventh Claim for Relief

85. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1034 through 1046 of the complaint, and refer all questions of law to this Honorable Court.

Seventy Eighth Claim for Relief

86. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1047 through 1050 of the complaint, and refer all questions of law to this Honorable Court.

Seventy Ninth Claim for Relief

87. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1051 through 1063 of the complaint, and refer all questions of law to this Honorable Court.

Eightieth Claim for Relief

88. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1064 through 1076 of the complaint, and refer all questions of law to this Honorable Court.

Eighty First Claim for Relief

89. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1077 through 1080 of the complaint, and refer all questions of law to this Honorable Court.

Eighty Second Claim for Relief

90. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1081 through 1093 of the complaint, and refer all questions of law to this Honorable Court.

Eighty Third Claim for Relief

91. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1094 through 1106 of the complaint, and refer all questions of law to this Honorable Court.

Eighty Fourth Claim for Relief

92. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1107 through 1110 of the complaint, and refer all questions of law to this Honorable Court.

Eighty Fifth Claim for Relief

93. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1111 through 1123 of the complaint, and refer all questions of law to this Honorable Court.

Eighty Sixth Claim for Relief

94. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1124 through 1136 of the complaint, and refer all questions of law to this Honorable Court.

Eighty Seventh Claim for Relief

95. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1137 through 1140 of the complaint, and refer all questions of law to this Honorable Court.

Eighty Eighth Claim for Relief

96. Defendants the allegations as they relate to answering defendants as set forth in paragraphs 1141 through 1153 of the complaint, and refer all questions of law to this Honorable Court.

Eighty Ninth Claim for Relief

97. Defendants deny the allegations as they relate to answering defendants as set forth in paragraphs 1154 through 1166 of the complaint, and refer all questions of law to this Honorable Court.

Ninetieth Claim for Relief

98. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1167 through 1170 of the complaint, and refer all questions of law to this Honorable Court.

Ninety First Claim for Relief

99. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1171 through 1183 of the complaint, and refer all questions of law to this Honorable Court.

Ninety Second Claim for Relief

100. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1184 through 1187 of the complaint, and refer all questions of law to this Honorable Court.

Ninety Third Claim for Relief

101. Defendants deny information to form a belief as to the allegations made as they concern co-defendants named herein, and deny the allegations as they relate to answering defendants as set forth in paragraphs 1188 through 1193 of the complaint, and refer all questions of law to this Honorable Court.

As to any paragraph of the complaint not specifically addressed herein same is denied.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE.

102. The complaint fails to state a cause of action as against Defendant M. Sadees M.D. P.C.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE.

103. The complaint fails to state a cause of action as against Defendant Nicolette Merav Sadees M.D.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE.

104. The complaint is barred in whole or in part as against the answering defendants by the applicable Statutes of Limitations.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE.

105. The complaint improperly joins the defendants in the action in violation of the Federal Rules of Civil Procedure Rule 20(a).

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE.

106. The complaint is barred due to the failure to join all necessary parties.

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE.

107. The complaint is barred due to the superseding/ intervening acts of third parties.

AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE.

108. The complaint is barred due to the failure to obtain personal jurisdiction over M. Sadees M.D. P.C.

AS AND FOR AN EIGHTH AFFIRMATIVE DEFENSE.

109. The complaint fails to state a cause of action against the answering defendants under 18 U.S.C. 1962(d) -- Civil Rico.

AS AND FOR A TENTH AFFIRMATIVE DEFENSE.

110. The complaint fails to state allegations with particularity and specificity as required by Rule 9(b) of the Federal Rules of Civil Procedure.

AS AND FOR AN ELEVENTH AFFIRMATIVE DEFENSE.

111. Plaintiffs' damages, if any, were caused by Plaintiffs' own actions and/ or omissions.

AS AND FOR A TWELFTH AFFIRMATIVE DEFENSE.

112. Plaintiffs' complaint is barred by the applicable rules and regulations of the New York State No Fault Law, Insurance Law Article 51.

AS AND FOR A THIRTEENTH AFFIRMATIVE DEFENSE.

113. Plaintiffs' complaint is barred by the doctrine of laches.

AS AND FOR A FOURTEENTH AFFIRMATIVE DEFENSE.

114. Plaintiffs' complaint is barred by estoppel and waiver.

AS AND FOR A FOURTEENTH AFFIRMATIVE DEFENSE.

115. Plaintiffs' complaint is barred due to prior actions.

AS AND FOR A FIFTEENTH AFFIRMATIVE DEFENSE.

116. Plaintiffs' claims in the complaint against the corporate defendant do not incur personal liability to the individual defendant.

AS AND FOR A SIXTEENTH AFFIRMATIVE DEFENSE.

117. Plaintiffs' failed to mitigate damages, if same were incurred.

AS AND FOR A SEVENTEENTH AFFIRMATIVE DEFENSE.

118. Plaintiffs' claims are barred due to equitable estoppel.

AS AND FOR AN EIGHTEENTH AFFIRMATIVE DEFENSE.

119. Plaintiffs' claims for unjust enrichment and fraud cannot be maintained where claim of breach of contract is alleged.

AS AND FOR A NINETEENTH AFFIRMATIVE DEFENSE.

120. Plaintiffs' claims are barred due to the Statute of Frauds.

AS AND FOR A TWENTIETH AFFIRMATIVE DEFENSE.

121. Plaintiffs' claims are barred due to the doctrine of collateral estoppel and res judicata.

AS AND FOR A TWENTY FIRST AFFIRMATIVE DEFENSE.

122. Plaintiffs' claims for damages, if any, are barred and/ or reduced through subrogation and recoupment.

AS AND FOR A TWENTY SECOND AFFIRMATIVE DEFENSE.

123. Plaintiffs' claims for damages, if any, are barred due to same being passed through to insureds through the adjustment of insurance rates as reported to the New York Insurance Department.

AS AND FOR A TWENTY THIRD AFFIRMATIVE DEFENSE.

124. Plaintiffs' cannot seek a declaratory judgment or other relief against the professional corporation that has been dissolved.

AS AND FOR A TWENTY FOURTH AFFIRMATIVE DEFENSE.

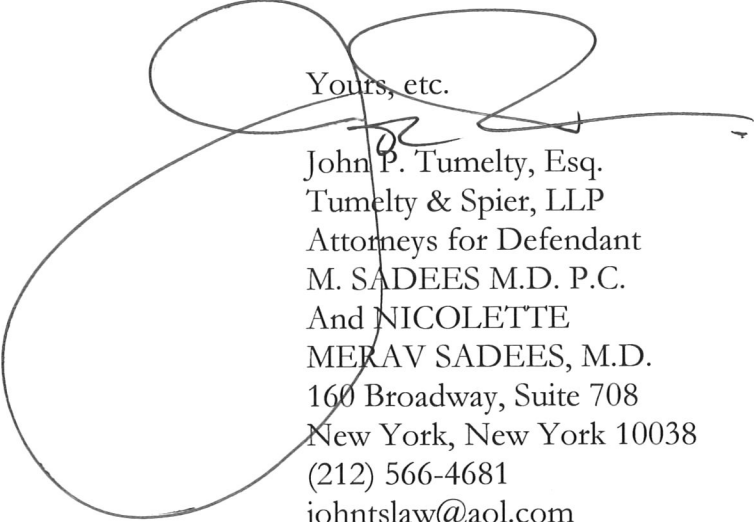
125. Plaintiffs' claims are barred as to any prior actions or other choices of forum chosen which predate the complaint.

ANSWERING DEFENDANTS DEMAND TRIAL BY JURY

ANSWERING DEFENDANTS reserve the right to amend or supplement this Answer and **AFFIRMATIVE DEFENSES** as additional information becomes known to the answering defendants throughout the discovery of this litigation.

Dated: New York, New York
March 20, 2015

Yours, etc.



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